

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

PAM La FOSSE, et al.,

Plaintiff,

v.

SANDERSON FARMS, INC.,

Defendant.

) CASE NO. 3:19-CV-06570 (RS)

) ORDER

) **STIPULATION OF DISMISSAL WITH
PREJUDICE AS TO REMAINING
PLAINTIFF AND CLAIMS**

) Judge: Honorable Richard Seeborg

) Location: Courtroom 3, 17th Floor,

) 450 Golden Gate Avenue,

) San Francisco, CA 94102

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WHEREAS, after a considerable expenditure of legal resources and a detailed review of the facts and law—including the Ninth Circuit’s decision in *Cohen v. ConAgra Brands, Inc.*, No. 20-55969, 2021 WL 4956243 (9th Cir. Oct. 26, 2021)—Plaintiff Pam La Fosse has determined to voluntarily dismiss her claims against Sanderson Farms, Inc. (“Sanderson”) with prejudice;

WHEREAS, Plaintiff and her counsel no longer seek to certify a class in this action and hereby withdraw any class allegations;

WHEREAS, Sanderson has not paid and will not pay to Plaintiff any consideration in respect of this dismissal, nor has Sanderson provided nor will it provide any other form of relief, and Plaintiff acknowledges she has not received and will not receive any compensation or relief in voluntarily deciding to dismiss her claims;

WHEREAS, the Parties all consent to dismissal of Plaintiff’s claims in accordance with and in recognition of the representations above;

WHEREAS, although this matter was filed as a class action, the class was not certified nor proposed to be certified, such that Court approval of the dismissal pursuant to Rule 23(e) of the Federal Rules of Civil Procedure is not required;

WHEREAS, the Parties agree to bear their own costs and legal fees as incurred;

1 **THEREFORE**, in recognition of the foregoing, and pursuant to Federal Rule of Civil
2 Procedure 41(a)(1)(A)(ii), Plaintiff Pam La Fosse and Defendant Sanderson Farms, Inc. hereby
3 STIPULATE that all remaining claims should be DISMISSED WITH PREJUDICE. Parties agree to bear
4 all costs as incurred.

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6 DATED: November 19, 2021

Respectfully submitted,

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8 /s/ Bonner C. Walsh

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27 *Counsel for Plaintiff*
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ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that I am the ECF user whose user ID and password are being used in the electronic filing of this document, and further attest that I have obtained the concurrence in the filing of the document from the other signatory.

/s/ Michael A. Glick

Michael A. Glick